FEB 19 2025

### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NORTH CAROLINA STATESVILLE DIVISION

US DISTRICT COURT WESTERN DISTRICT OF NO

UNITED STATES OF AMERICA	) Docket No. 5:25-cr-5-K	DB
	) ) BILL OF INDICTME	NT
v.	) <u> </u>	. 1 .
SARA ALEXANDRIA WINTERS	) Violations:	
	) 21 U.S.C. § 841	
	) 21 U.S.C. § 846	
	)	

#### THE GRAND JURY CHARGES:

## **COUNT ONE** (Drug Trafficking Conspiracy)

From at least as early as in or about January 2024 and continuing until on or about May 29, 2024, in Catawba County and Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

#### SARA ALEXANDRIA WINTERS,

did knowingly and intentionally conspire and agree with other persons, known and unknown to the Grand Jury, to distribute and to possess with intent to distribute quantities of a mixture and substance containing a detectable amount of methamphetamine and N-phenyl-N-[1-(2-phenylethyl)-4 piperidinyl] propanamide ("fentanyl"), both Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); all in violation of Title 21, United States Code, Section 846.

# **COUNT TWO**(Possession with the Intent to Distribute Methamphetamine)

On or about May 28, 2024, in Catawba County, within the Western District of North Carolina, and elsewhere, the defendant,

#### SARA ALEXANDRIA WINTERS,

did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

#### **NOTICE OF FORFEITURE**

Notice is hereby given of 21 U.S.C. § 853. The following property is subject to forfeiture in accordance with Section 853:

- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations; and
- c. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) or (b) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant's to the extent of the value of the property described in (a) and (b).

A TRUE BILL:

FOREPERSON

LAWRENCE J. CAMERON ACTING UNITED STATES ATTORNEY

STEVEN R. KAUFMAN

ASSISTANT UNITED STATES ATTORNEY